

Geoffrey Graber (SBN 211547)
Karina G. Puttieva (SBN 317702)
Madelyn Petersen (*pro hac vice*)
Jenna Waldman (SBN 341491)
**COHEN MILSTEIN SELLERS &
TOLL PLLC**
1100 New York Ave. NW, Ste. 800
Washington, DC 20005
Telephone: (202) 408-4600
Facsimile: (202) 408-4699
ggraber@cohenmilstein.com
kputtieva@cohenmilstein.com
mpetersen@cohenmilstein.com
jwaldman@cohenmilstein.com

Charles Reichmann (SBN 206699)
**LAW OFFICES OF CHARLES
REICHMANN**
16 Yale Circle
Kensington, CA 94708-1015
Telephone: (415) 373-8849
charles.reichmann@gmail.com

Class Counsel

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

DZ RESERVE and CAIN MAXWELL (d/b/a/
Max Martialis), individually and on behalf of
others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Eric Kafka (*pro hac vice*)
**COHEN MILSTEIN SELLERS &
TOLL PLLC**
88 Pine Street, 14th Floor,
New York, NY 10005
Telephone: (212) 838-7797
Facsimile: (212) 838-7745
ekafka@cohenmilstein.com

Case No. 3:18-cv-04978-JD

**DECLARATION OF GEOFFREY
GRABER IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT'S
MOTION TO COMPEL ARBITRATION**

Complaint Filed: August 15, 2018
Trial Date: October 14, 2025
Court: Courtroom 11, 19th Floor
Hon. James Donato

DECLARATION OF GEOFFREY GRABER

I, Geoffrey Graber, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and admitted in this Court. I am a partner with the law firm of Cohen Milstein Sellers & Toll PLLC, and counsel for Plaintiffs and the class in the above-captioned matter. I have personal knowledge of the facts set forth in this Declaration. If called as a witness, I could and would competently testify as to these facts under oath. I submit this declaration in support of Plaintiffs' Opposition to Defendant's Motion to Compel Arbitration.

2. Attached hereto as **Exhibit 1** is a true and correct copy of an email sent by Melanie M. Blunschi, counsel for Meta Platforms, Inc., on July 17, 2025.

3. Attached hereto as **Exhibit 2** is a true and correct copy of Facebook, Inc.'s Responses and Objections to Plaintiffs' Third Set of Interrogatories, dated October 23, 2019, with portions redacted.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this day, September 6, 2025,

By: /s/Geoffrey Graber